

**Comments on text resulting from the Terrestrial Animal Health Code
Commission Report – September 2005 Meeting
Submitted by the United States of America**

Appendix 3.7.3.

Guidelines for the Transport of Animals by Land

General comments

Our experts are concerned with the appearance of inconsistency in the guidelines concerning the designated individual(s) responsible for determining the “fitness” of animals to travel. In Article 3.7.3.1, Responsibilities 4 (d) – states that fitness to travel should be determined by drivers, and if in doubt, the animal should be examined by a veterinarian. In other words, primary responsibility for determining fitness is assigned to the driver. In Article 3.7.3.2, Competence 3 (e) – responsibility for fitness to travel is assigned to the *animal handler* and in Article 3.7.3.5, Pre-journey 5 (a) – responsibility for fitness to travel is assigned to either an *animal handler* or a veterinarian, unless the fitness to travel is in doubt. Additionally, in Article 3.7.3.4, Documentation 3 (a) – “fitness to travel” is identified as part of the veterinary certification.

The intent appears to be that a requirement for veterinary examination to determine an animal’s fitness to travel is the exception rather than a mandate; therefore, we believe this should be consistently stated throughout the document. Our suggested changes to the proposed text are the following: Article 3.7.3.4, Documentation 3 (a), the text should be deleted; Article 3.7.3.5, Pre-journey 5 (a), amend the text to read “Each animal should be inspected by ~~a veterinarian~~ an animal handler to assess fitness to travel”. If its fitness to travel is in doubt, the animal should be examined by a veterinarian.

Specific comments

Article 3.7.3.1.

Responsibilities

Current proposed text:

Item 1: The owners and managers of the animals are responsible for the general health of the animals and their fitness for the journey, and for the overall welfare during the journey, regardless of whether duties are subcontracted to other parties during transport.

Suggested proposed text

Item 1: The owners and managers of the animals are responsible for the general health of the animals and their fitness for the journey, ~~and for the overall welfare during the journey, regardless of whether duties are subcontracted to other parties during transport.~~

Comment/Rationale: Once the owners and managers have transferred responsibility of their animals to transporters, they no longer have control over the animals’ welfare. Therefore, the text “and for the overall welfare during the journey etc...” should be deleted from the guidelines.

Current proposed text:

Item 5: Managers of facilities at the start and at the end of the journey and at resting points are responsible for:

Part (f) - providing facilities for washing and disinfecting vehicles after unloading

Suggested proposed text:

~~Part (f) – providing facilities for washing and disinfecting vehicles after unloading.~~ Part (f) should be deleted from the guidelines.

Comment/Rationale: Providing facilities for washing and disinfecting vehicles after unloading” is a good production practice but not an animal welfare issue. Therefore, the text should be deleted from the guidelines.

Current proposed text:

Item 6: The responsibilities of *Competent Authorities*

Parts (c) and (d) – “setting standards for the competence of drivers, animal handlers, and managers” and “ensuring appropriate awareness and training of drivers, animal handlers and managers;

Suggested proposed text:

Item 6: Parts (c) and (d) – ~~“setting standards for the competence of drivers, animal handlers, and managers” and “ensuring appropriate awareness and training of drivers, animal handlers and managers;~~ delete Parts (c) and (d) from the guidelines.

Comment/Rationale: The purview of the Competent Authorities does not include “setting standards for the competence of drivers, animal handlers and managers” or “ensuring appropriate awareness and training of drivers, animal handlers and managers” therefore; the text should be deleted from the guidelines.

Current proposed text:

Item 8: “The receiving *Competent Authority* should report back to the sending *Competent Authority* on significant animal welfare problems that occurred during the journey.

Item 8: “The receiving *Competent Authority* should report back to the sending *Competent Authority* on significant animal welfare problems ~~which~~ that occurred during the journey.

Comment/Rationale:

The suggested change in the text is to clarify the intent of the guideline for the reader.

Article 3.7.3.2.

Competence

Current proposed text:

Item 2: The competence of animal handlers should be demonstrated through a current certificate from an independent body, accredited by the *Competent Authority*. The certificate should be in one of the OIE official languages if the international transportation is involved adequate training and experience to address the welfare needs of animals in their care

Suggested proposed text:

Item 2: The competence of animal handlers should be demonstrated through ~~a current certificate from an independent body, accredited by the *Competent Authority*. The certificate should be in one of the OIE official languages if the international transportation is involved~~ adequate training and experience to address the welfare needs of animals in their care.

Comment/Rationale: There is no scientific basis to require the demonstration of competence through a certification program; therefore the text should be deleted. Competence of animal handlers should be demonstrated through adequate training and experience to address the welfare needs of the animals in their care.

Current proposed text:

Item 3: Part (b), – responsibilities for animals during the journey, ~~including loading and unloading.~~

Suggested proposed text:

Item 3: Part (b), – responsibilities for animals during the journey, including loading and unloading.

Comment/Rationale:

The text “including loading and unloading” should not be deleted from the competency requirement for animal handlers. According to Article 3.7.3.1, Responsibilities – Item 3, of the guidelines, “animal handlers are responsible for the humane handling and care of the animals, especially during loading and unloading”, consequently they should be required to be competent to load and unload animals.

Article 3.7.3.3.

Planning the journey

Current proposed text:

Item 1: **General considerations** – Part (c) Regulations concerning drivers (for example, maximum driving periods) should be harmonized with maximum transport journey intervals appropriate for the species.

Suggested proposed text:

Item 1: General considerations – Part (c) Regulations concerning drivers (for example, maximum driving periods) should be harmonized with maximum transport journey intervals based on sound science appropriate for the species.

Comment/Rationale:

The proposed guideline does not contain any reference to sound science as the basis for regulating maximum transport journey intervals. The specific text “based on sound science” should be added to reflect the OIE’s stated philosophy, that sound science should be the basis for creating the guidelines.

Current proposed text:

Item 2: Preparation of animals for the journey – (b) Since animals more accustomed to contact with humans and with being handled are likely to be less fearful of being loaded and transported. People handling animals should handle and load animals in a manner that reduces their fearfulness and improves their approachability.

Suggested proposed text:

Item 2: Preparation of animals for the journey – (b) ~~Since~~ Animals that are more accustomed to contact with humans and with being handled are likely to be less fearful of being loaded and transported. Therefore, people handling the animals should handle and load animals in a manner that reduces their fearfulness and improves their approachability.

Comment/Rationale:

The suggested change in the text is to clarify the intent of the guideline for the reader.

Current proposed text:

Item 3: Nature and duration of the journey
The maximum duration of a journey should be determined according to:

Suggested proposed text:

Item 3: Nature and duration of the journey
The maximum duration of a journey should be determined ~~according to~~ by sound science. Factors that may affect journey time include the following:

Comment/Rationale:

The proposed guideline does not reference sound science as the basis for regulating maximum journey duration. The guideline should be changed to reflect OIE’s stated philosophy that sound science should be the basis for welfare guidelines.

Current proposed text:

Item 6: Space allowance –Part (b) The space required on a vehicle or in a container depends upon whether or not the animals need to lie down (for example, pigs, camels, and poultry), or to stand (horses). Animals which will need to lie down often stand when first loaded or when the vehicle is driven with too much lateral movement or sudden braking

Suggested proposed text:

Item 6: Space allowance –Part (b) The space required on a vehicle or in a container depends upon ~~whether or not the animals need to lie down (for example, pigs, camels, and poultry), or to stand (horses). Animals which will need to lie down often stand when first loaded or when the vehicle is driven with too much lateral movement or sudden~~ braking the interaction of factors of whether or not the animals need to lie down (for example pigs, camels and poultry), or to stand (horses) and the length of the journey. Animals which will need to lie down often stand when first loaded or when the vehicle is driven with too much lateral movement or sudden breaking.

Comment/Rationale:

The proposed guideline does not take into consideration that animals do not need enough space to lie down on short journeys.

Current proposed text:

Item 6: Space allowance –Part (f) Calculations for the space allowance for each animal should be carried out using the figures given in Appendix XXX or, in their absence, in a relevant national or international document. The number and size of pens on the vehicle should be varied to where possible accommodate already established groups of animals while avoiding group sizes which are too large.

Suggested proposed text:

Item 6: Space allowance – Part (f) Calculations for the allowance for each animal should be carried out using the figures given in Appendix XXX or in the absence, in a relevant national or international document. The number and size of pens on the vehicle should be varied to where possible accommodate already established groups of animals. ~~while avoiding group sizes which are too large.~~

Comment/Rationale:

There proposed guideline does not include a reference to sound science as the basis for avoiding group sizes which are too large. Additionally, there is too much subjectivity in determining if a group of animals is “too large”. Therefore, the text “while avoiding group sizes which are too large” should be deleted from the guidelines.

Current proposed text:

Item 9: Control of disease_– Part (d), medications used prophylactically or therapeutically should only be administered by a veterinarian or other person who has been instructed in their use by a veterinarian and agreed by the Veterinary Authority of the importing country.

Suggested proposed text:

Item 9: Control of disease_– Part (d), medications used prophylactically or therapeutically should only be administered by a veterinarian or other person who has been instructed in their use by a veterinarian. ~~and agreed by the Veterinary Authority of the importing country.~~

Comment/Rationale:

We are concerned about the proposed requirement to obtain permission from the importing country prior to administration of medication used for therapeutic purposes. This requirement may unnecessarily delay treatment of ill animals to the detriment of animal health and welfare. Therefore, the proposed text, “and agreed by the Veterinary Authority of the importing country”, should be deleted from the proposed document.

Article 3.7.3.4.

Documentation**Current proposed text :**

Item 1: Animals should not be loaded until the documentation required to that point is complete.

Item 2: The documentation accompanying the consignment should include: Parts (a) – (i)

Item 3: When veterinary certification is required to accompany consignments of animals it should include address: Parts (a) – (d).

Suggested proposed text:

~~**Item 1:** Animals should not be loaded until the required documentation required to that point is complete.~~

~~**Item 2:** The documentation accompanying the consignment should include: Parts (a) – (i)~~

~~**Item 3:** When veterinary certification is required to accompany consignments of animals it should include address: Parts (a) thru (d).~~

Comment/Rationale:

We recommend deleting the requirement for documentation contained in Items 1 – 3 from the proposed guidelines. The requirement for documentation is a good production practice and is an issue for the local/national authorities because it must meet the animal health needs of that location and those specific authorities. The OIE can not venture to know what those specific individuals needs are and has not scientific justification to dictate documentation content.

Pre-journey period

Current proposed text:

Item 1: General considerations – Part (a), Pre-journey rest is necessary if the welfare of animals has become poor during the collection period because of the physical environment or the social behavior of the animals.

Suggested proposed text:

Item 1: General considerations – ~~Part (a), Pre-journey rest is necessary if the welfare of animals has become poor during the collection period because of the physical environment or the social behavior of the animals.~~ The entire subpart should be deleted.

Comment/Rationale:

Our experts recommend that the proposed guideline should be deleted. The guideline does not provide a scientific basis for the relationship of the welfare of animals to the requirement for pre-journey rest. The issue of pre-journey rest is a good production practice which may affect the welfare of an animal, but it is not a welfare issue. The need for pre-journey rest should be based on the professional judgment of a veterinarian or someone trained in animal husbandry.

Current proposed text:

Item 1: General considerations – Part (c), Consideration should be given to an animal's previous transport experience, training and conditioning if known as these may reduce fear and stress in animals.

Suggested proposed text:

Item 1: General considerations – Part (c), Consideration should be given to an animal's previous transport experience, training and conditioning if known as these may ~~reduce~~ affect fear and stress in animals.

Comment/Rationale:

We agree that previous transport experience, training and conditioning can affect animals' responses to transport. Such effects, however, can be positive or negative depending on the nature of that experience. For this reason, we recommend the word affect replace ~~reduce~~ from the proposed guideline.

Current proposed text:

Item 1: General considerations – Part (e), When animals are to be provided with a novel diet or method of feed or water provision during an adequate period of adaptation should be planned.

Suggested proposed text:

Item 1: General considerations – Part (e), When animals are to be provided with a novel diet or method of feed or water administration, ~~provision during~~, an adequate period of adaptation should be planned.

Comment/Rationale:

The suggested change in the text is to clarify the intent of the guideline for the reader.

Current proposed text:

Item 2: Selection of compatible groups – Part (b), animals of the same species can be mixed unless there is a significant likelihood of aggression; aggressive individuals should be segregated (recommendations for specific species are described in detail in Article 3.7.3.10.). For some species, animals from different groups should not be mixed because poor welfare occurs unless they have established a social structure;

Suggested proposed text:

~~Item 2: Selection of compatible groups – Part (b), animals of the same species should not can be mixed if unless there is a significant likelihood of aggression; aggressive individuals should be segregated (recommendations for specific species are described in detail in Article 3.7.3.10.). For some species, animals from different groups should not be mixed because poor welfare occurs unless they have established a social structure;~~

Comment/Rational:

The complete text of the proposed guideline should be deleted. Mixing animals together, even of the same species, may result in significant likelihood of aggression and fighting because of the nature of the animals. Therefore, the text in subpart (b) should be deleted in its entirety or reworded to indicate that the prevention of severe injury is the intended outcome of the guideline.

Current proposed text:

Item 5: Fitness to travel – Part (c); subpart (vi) — Pregnant animals which would be in the final 10% of their gestation period at the planned time of unloading.

Suggested proposed text:

Item 5: Fitness to travel – Part (c); subpart (vi) — Pregnant animals that ~~which~~ would be in the final 10% of their gestation period at the planned time of unloading.

Comment/Rationale:

The suggested change in the wording of the text clarifies the intent of the guideline for the reader.

Current proposed text:

Item 5: Fitness to travel – Part (c); subpart (vii): females traveling without young which have given birth within the previous 48 hours;

Suggested proposed text:

~~Item 5: Fitness to travel — Part (c); subpart (vii): females traveling without young which have given birth within the previous 48 hours;~~

Comment/Rationale:

The guideline states that females traveling without young that have given birth within the previous 48 hours are unfit for travel. It is unclear why females which have given birth within the previous 48 hours are unfit to travel. The proposed guideline should be deleted or clarified.

Article 3.7.3.6.

Loading**Current proposed text:**

Item 2: Facilities, Part (b) – Last sentence. Artificial lightening may be required.

Suggested proposed text:

Item 2: Facilities, Part (b) – Last sentence. Artificial lighting ~~lightening~~ may be required.

Comment/Rationale:

The proposed text contains a typographical error, we recommend changing the word lightening to lighting to clarify the intent of the guideline for the reader.

Current proposed text:

Item 3: Goads and other aids – Part (f): The throwing or dropping of animals, or their lifting or dragging by body parts such as their tail, head, horns, ears, limbs, wool, hair or feathers should not be permitted. The manual lifting of small animals is permissible.

Suggested proposed text:

Item 3: Goads and other aids – Part (f): The throwing or dropping of animals, or their lifting or dragging by body parts such as their tail, head, horns, ears, limbs, hair, wool, or feathers should not be permitted unless in an emergency situation that, if prolonged, could result in injury or pain. The manual lifting of small animals is permissible.

Comment/Rationale:

There are instances when emergencies occur during transport which dictate that an animal be dragged or moved by limbs to facilitate its immediate removal from a dangerous situation. There must be flexibility in the guidelines to address these situations.

Article 3.7.3.7.

Travel

Current proposed text:

Item 3: Regulating the environment within vehicles or containers – Part (b): The animal's environment in hot weather can be regulated by the flow of air produced by the movement of the vehicle. In warm and hot weather, the duration of journey stops should be minimized and vehicles should be parked under shade with adequate and appropriate ventilation.

Suggested proposed text:

Item 3: Regulating the environment within vehicles or containers – Part (b): The animal's environment in hot weather can be regulated by the flow of air produced by the movement of the vehicle. In warm and hot weather, the duration of journey stops should be minimized and vehicles should have ~~be parked under shade with~~ adequate and appropriate ventilation.

Comment/Rationale:

It is not always possible to find shade during transportation. We suggest that if the specific text is deleted, “be parked under shade with”, the remaining text will address the desired outcome of the guideline to ensure adequate and appropriate ventilation of the animal's environment.

Current proposed text:

Item 4: Vehicle and container design and maintenance – Part (i): When appropriate suitable bedding should be added to vehicle floors to assist absorption of urine and feces, to minimize slipping by animals, and protect animals (especially young animals) from hard flooring surfaces and adverse weather conditions.

Suggested proposed text:

Item 4: Vehicle and container design and maintenance – Part (i): ~~When appropriate~~ Suitable bedding should be added to vehicle floors to assist absorption of urine and feces, to minimize slipping by animals, and protect animals (especially young animals) from hard flooring surfaces and adverse weather conditions.

Comment/Rationale:

The proposed text should be deleted because all of the listed reasons contained in the guideline for adding suitable bedding to vehicle floors are important and it is questionable that it would ever be inappropriate to make provisions for them.

Current proposed text:

Item 6: Rest periods and conditions including hygiene – Part (a): Animals that are being transported should be rested at appropriated intervals during the journey and offered feed and water, either on the vehicle or, if necessary, unloaded into suitable facilities.

Suggested proposed text:

Item 6: Rest periods and conditions including hygiene – Part (a): Animals that are being transported should be rested at appropriated intervals, based on sound science and as appropriate for the species, during the journey and offered feed and water, either on the vehicle or, if necessary, unloaded into suitable facilities.

Comment/Rationale:

There proposed text does not provide science based guidance on the basis for the “appropriate interval” for rest. The text should be changed to reflect the OIE’s stated philosophy that sound science should be the basis for establishing the animal welfare guidelines.

Current proposed text:

Item 7: In-transit observations – Part (a), Animals being transported by road should be observed soon after a journey is commenced and whenever the driver has a rest stop (with a maximum interval of 5 hours. After meal breaks and refueling stops, the animals should be observed immediately prior to departure.

Item 7: In-transit observations – Part (b), Animals being transported by rail should be observed at each scheduled stop nearest to 5 hours since the last observation. The responsible rail transported should monitor the progress of trains carrying animals and take all appropriate action to minimize delays.

Suggested proposed text:

Item 7: In-transit observations – Parts (a) and (b): The text in each part should be deleted or re-written with the use of maximum time intervals that are based on sound science.

Comment/Rationale:

Is there a scientific basis for a maximum interval between rest stops and observation of 5 hours and for all species? Without the scientific basis for the use of the specific time interval, the proposed guidelines are opinion and counter to OIE’s philosophy of basing the guidelines on sound science. Our experts recommend deleting the text until the recommended rest interval time frame is science based.

Unloading and post-journey handling

Current proposed text:

Item 2: Sick and injured animals – Part (a): An animal that has become sick, injured or disabled during a journey should be appropriately treated or humanely killed (see Appendix 3.7.6. on humane killing of animals for disease control purposes). When necessary, veterinary advice should be sought in the care and treatment of these animals. In some cases where animals are non-ambulatory due to fatigue, injury, or sickness it may be in the best welfare interests of the animal to be treated or euthanized aboard the vehicle.

Suggested proposed text:

Item 2: Sick and injured animals – Part (a): An animal that has become sick, injured or disabled during a journey should be appropriately treated or humanely killed (see Appendix 3.7.6. on humane killing of animals for disease control purposes). When necessary, veterinary advice should be sought in the care and treatment of these animals. ~~In some cases, where animals are non-ambulatory due to fatigue, injury, or sickness it may be in the best welfare interests of the animal to be treated or euthanized aboard the vehicle.~~ The proposed text in should be deleted from the guidelines.

Comment/ Rationale:

The proposed text should be deleted because a fatigued pig is defined as having temporarily lost the ability or want to walk, but has a reasonable expectation to recover full locomotion with rest. The proposed text in part (a) is overly restrictive by allowing only treatment or euthanasia of the animal aboard the vehicle. Animals that are observed to be “fatigued” may be humanely unloaded from the vehicle and allowed to rest and recover in the lairage. Additionally, due to possible restrictive space aboard the transport vehicle, treating or euthanizing a sick or injured animal aboard the vehicle may pose a safety hazard for the worker.

Current proposed text:

Item 4: Cleaning and disinfection – Part (a): Vehicles, crates, containers, etc. used to carry the animals should be cleaned before re-use through the physical removal of manure and bedding by scraping, washing and flushing vehicles and containers with water and detergent. This should be followed by disinfection when there are concerns about disease transmission.

Item 4: Cleaning and disinfection – Part (b): Manure, litter, bedding and the bodies of any animals which die during the journey should be disposed of in such a way as to prevent the transmission of disease and in compliance with all relevant health and environmental legislation.

Item 4: Cleaning and disinfection – Part (c): Establishments like livestock markets, slaughterhouses, resting sites, railway stations, etc. where animals are unloaded should be provided with appropriate areas for the cleaning and disinfection of vehicles.

Item 4: Cleaning and disinfection – Part (d): Where disinfestation is necessary, it should be carried out with minimum stress to the animals.

Suggested proposed text:

Item 4: Cleaning and disinfection – Parts (a) thru (d) should be deleted.

Comment/Rationale: Our experts acknowledge that this section contains information that addresses good production practices but it is not directed related to animal welfare. For example, the availability of cleaning and disinfecting areas in markets, slaughterhouses, etc. is a goal that is worthy but it is not an animal welfare issue.